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Co-Lead Counsel

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION

MDL No. 2843
Case No. 18-md-02843-VC

This document relates to:

ALL ACTIONS

**DECLARATION OF DEREK W.
LOESER IN SUPPORT OF PLAINTIFFS'
MOTION FOR LIMITED DISCOVERY**

Fed. R. Civ. P. 26(d)

Judge: Hon. Vince Chhabria
Courtroom: 4, 17th Floor
Hearing Date: August 23, 2018
Hearing Time: 10:00 a.m.

I, Derek W. Loeser, declare as follows:

1. I am a partner at the law firm of Keller Rohrback L.L.P. and am Co-Lead Counsel for Plaintiffs in the above-captioned matter. I submit this declaration in support of Plaintiffs' Motion for Limited Discovery. I have personal knowledge of the information contained herein, and, if called as a witness, I could and would testify competently thereto.

2. Attached hereto as Exhibit A is a true and correct copy of the November 18, 2016 Order in *In re: 21st Century Oncology Customer Data Security Breach Litigation*, No. 8:16-md-2737-MSS-AEP (M.D. Fla. Nov. 18, 2016), ECF No. 81.

3. Attached hereto as Exhibit B is a true and correct copy of the February 16, 2018 Order Denying Defendants' Motion to Stay Discovery in *Optronic Technologies, Inc. v. Ningbo Sunny Electronic Co., Ltd.*, No. 5:16-cv-06370-EJD (N.D. Cal. Feb. 16, 2018), ECF No. 58.

4. Attached hereto as Exhibit C is a true and correct copy of the November 4, 2016 Order Denying Motion for Stay of Discovery in *Singh v. Google, Inc.*, No. 16-cv-03734-BLF (N.D. Cal. Nov. 4, 2016), ECF No. 41.

5. Attached hereto as Exhibit D is a true and correct copy of the May 21, 2013 Order re: Production of Information Produced to Grand Jury in *In re: Lithium Ion Batteries Antitrust Litigation*, No. 13-md-02420-YGR (N.D. Cal. May 21, 2013), ECF No. 200.

6. Attached hereto as Exhibit E is a true and correct copy of the July 13, 2018 Case Management Order No. 4 in *In re: Apple Inc. Device Performance Litigation*, No. 18-md-02827-EJD (N.D. Cal. July 13, 2018), ECF No. 163.

7. Attached hereto as Exhibit F is a true and correct copy of the November 30, 2010 Order in *In re Platinum & Palladium Commodities Litig.*, No. 10-cv-3617-WHP (S.D.N.Y. Nov. 30, 2010), ECF No. 59.

8. Attached hereto as Exhibit G is a true and correct copy of the August 9, 2017 Pretrial Order No. 9 in *In re Chrysler-Dodge-Jeep EcoDiesel Marketing, Sales Practices and Products Liability Litigation*, No. 3:17-md-02777-EMC (N.D. Cal. Aug. 9, 2017), ECF No. 202.

9. Attached hereto as Exhibit H is a true and correct copy of the Pretrial Order No. 6 in *In re Viagra (Sildenafil Citrate) Products Liability Litigation*, No. 16-md-2691-RS (N.D. Cal. Sept. 26, 2016), ECF No. 102.

10. Attached hereto as Exhibit I is a true and correct copy of the February 2, 2016 Minute Order in *In re Resistors Antitrust Litig.*, No. 5:15-cv-03820-RMW (N.D. Cal. Feb. 2, 2016), ECF No. 112.

11. Attached hereto as Exhibit J is a true and correct copy of the Minute Order and Case Management Order in *In re High Tech Employee Antitrust Litig.*, No. 5:11-cv-02509-LHK (N.D. Cal. Oct. 26, 2011), ECF No. 88.

12. Attached hereto as Exhibit K is a true and correct copy of the Order No. 3 in *In re Toyota Motor Corp. Unintended Acceleration Mktg., Sales Practices & Prods. Liab. Litig.*, No. 8:10-md-02151 (C.D. Cal. June 1, 2010), ECF No. 180.

13. Attached hereto as Exhibit L is a true and correct copy of the July 5, 2016 Letter Order in *In re Liquid Aluminum Sulfate Antitrust Litig.*, No. 16-md-2687-JLL-JAD (D.N.J. July 5, 2016), ECF No. 209.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 8, 2018.

/s/ Derek W. Loeser

Derek W. Loeser

CERTIFICATE OF SERVICE

I, Derek W. Loeser, hereby certify that, on August 8, 2018, I electronically filed the foregoing with the Clerk of the United States District Court for the Northern District of California using the CM/ECF system, which shall send electronic notification to all counsel of record.

/s/ Derek W. Loeser

Derek W. Loeser